

Exhibit B

Exhibit B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

No. 07-cv-05944 SC
This Document Relates to: MDL No. 1917
...(continuing caption page 2)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
CITY AND COUNTY OF SAN FRANCISCO

STATE OF CALIFORNIA, et al.,

Plaintiffs,

v.

SAMSUNG SDI, INC., CO., LTD,
et al.,

Defendants.

HIGHLY CONFIDENTIAL
DEPOSITION OF LG ELECTRONICS
KYUNG TAE KWON
San Francisco, California
Friday, July 13, 2012
Volume I

Reported by:
SUZANNE F. BOSCHETTI
CSR No. 5111

1 A That's right. 11:44:42

2 Q And how was that allocated? 11:44:43

3 A As I explained earlier, we have the cost at 11:45:06

4 the time we first set up that particular conveyor 11:45:16

5 belt. And we divide that amount into the period of 11:45:20

6 the time the conveyor belt is to be used. And 11:45:25

7 usually it's five years, so we divide that amount 11:45:30

8 into five years and that's how we calculate. 11:45:34

9 Q All right. Any other costs that you 11:45:50

10 haven't described for me that were involved in the 11:45:53

11 manufacture of CRT televisions? 11:45:55

12 A I think I described -- described most of 11:46:11

13 the manufacturing related costs. 11:46:16

14 Q All right. Now, LG Electronics USA was not 11:46:19

15 in the business of manufacturing CRT televisions, 11:46:24

16 correct? 11:46:27

17 A Correct. 11:46:34

18	Q	So when LG Electronics Inc. or one of its	11:46:34
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19 affiliates completed its manufacture of the CRT TV 11:46:39

20 for shipment to the United States and shipped the 11:46:44

21 CRT TV to LG Electronics USA, which entity bore the 11:46:49

22 cost of shipping the TV to the United States? 11:46:58

23 A There is depending on the sales conditions. 11:47:26

24 If the condition is in the form of FOB, it is the 11:47:52

25 United States entity that bears the cost. If the 11:47:58

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8 I, KYUNG TAE KWON, do hereby declare under
9 penalty of perjury that I have read the foregoing
10 transcript of my deposition; that I have made such
11 corrections as noted herein, in ink, initialed by
12 me, or attached hereto; that my testimony as
13 contained herein, as corrected, is true and correct.

14 EXECUTED this 22 day of August,
15 2012, at Seoul, Korea.
16 (City) (State)

17
18 KYUNG TAE KWON 
KYUNG TAE KWON

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1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were duly sworn; that a record
8 of the proceedings was made by me using machine
9 shorthand which was thereafter transcribed under my
10 direction; that the foregoing transcript is a true
11 record of the testimony given.

12 I further, certify I am neither financially
13 interested in the action nor a relative or employee
14 of any attorney or party to this action.

15 IN WITNESS WHEREOF, I have this date
16 subscribed my name.

17
18 Dated: 7/21/12
19
20
21
22

23 SUZANNE F. BOSCHETTI

24 CSR No. 5111
25

ERRATA SHEET**CRT 30(b)(6) Deposition of LGE Defendants - KYUNG TAE KWON****July 13, 2012**

Page	Line	Change and/or Correction	Reason
12	2	"in" to "and"	Transcription error
15	10	"am" to "do"	Clarification of response
18	16	"how come those results" to "how those results"	Inaccurate translation later corrected by interpreter
21	13	Delete "kinds of"	Transcription error
26	20	"1985" to "1995"	Transcription Error
44	6	"bell" to "valve"	Transcription error
49	12	"monitors that people" to "monitors in that people"	Clarification of response
65	20	"printed out" to "retrieved"	Inaccurate translation later corrected by interpreter
70	4	"system when" to "system as backup data when"	Inaccurate translation later corrected by interpreter
71	23	"TPT" to "CPT"	Transcription error